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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:17 CR 92
	)	JUDGE NUGENT
Plaintiff,	)	
	)	MAG. JUDGE PARKER
v.	)	**INDICTMENT**
	)	
	)	
CATHERINE I. WILSON,	)	Title 18, United States Code, Section
	)	1344(2)
Defendant.	)	

The Grand Jury charges:

Counts 1-15
(Bank Fraud: 18 U.S.C. § 1344(2))

General Allegations

At all times relevant to the indictment:

1. The defendant, CATHERINE I. WILSON ("Defendant" or "WILSON") was employed by Koppel Advertising, Inc. ("Koppel") from approximately 1991 through on or about September 30, 2014. As part of her duties as an employee of Koppel, WILSON assisted in the payment of Koppel's outstanding bills from its bank account.

2. Koppel was a corporation that sold and distributed promotional and advertising products to customers. Koppel maintained its principal place of business in Bedford, Ohio, in the Northern District of Ohio, Eastern Division.

3. From at least as early as January 1, 2011 through on or about April 12, 2013, Koppel maintained a business checking account at Citizens Bank, account number XXXXXX4281. During this time period, Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

4. On or about April 12, 2013, FirstMerit purchased Citizens Bank. Thereafter, from on or about April 12, 2013 to September 30, 2014, Koppel maintained a business checking account at First Merit Bank, account number XXXXXX4281. During this time period, FirstMerit was a financial institution the deposits of which were insured by the FDIC.

5. WILSON was an authorized signatory on Koppel's business checking accounts at FirstMerit and Citizens Bank. WILSON was authorized to write checks from these accounts to pay Koppel's business expenses.

The Scheme to Defraud and Obtain Money

6. From at least as early as January 1, 2011 through on or about September 30, 2014, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, CATHERINE I. WILSON, defendant herein, knowingly executed and attempted to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property of Koppel that was under the custody and control of Citizens Bank and First Merit, financial institutions, by means of materially false and fraudulent pretenses, representations, and promises.

7. It was part of the scheme that WILSON used her position as a Koppel employee to embezzle company funds from Koppel's bank accounts in order to pay her personal bills and expenses.

8. It was further part of the scheme that WILSON conducted financial transactions with financial institutions (1) falsely representing that she was authorized to conduct the transactions, and (2) failing to disclose the material fact that she was conducting the transactions for her personal benefit and not on behalf of Koppel.

9. It was further part of the scheme that WILSON concealed her activity by altering the legitimate bank statements received from the financial institutions to remove records relating to her unauthorized transactions and providing the false statements to Koppel's owner.

10. As a result of this scheme and artifice to defraud, WILSON fraudulently obtained approximately $288,235.47.

Execution of the Scheme

11. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant WILSON did knowingly execute, and attempt to execute, a scheme and artifice to obtain approximately $288,235.47 of the monies and funds under the custody and control of Citizens Bank and FirstMerit, financial institutions, by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts, causing monies to be issued on the basis of unauthorized checks and electronic payments, including the following:

Count	Date	Amount	Payee
1	5/1/2014	$451.43	Capital One credit card
2	5/2/2014	$175.00	Barclays Bank credit card
3	5/8/2014	$353.42	Broadway Animal Clinic
4	5/9/2014	$841.00	Ray & Chris Bielecki
5	5/9/2014	$720.00	Ken Montlack Ltd.

6	5/9/2014	$494.87	Capital One credit card
7	5/13/2014	$250.00	Capital One credit card
8	5/15/2014	$267.33	Capital One credit card
9	5/16/2014	$250.00	Capital One credit card
10	5/16/2014	$250.00	Capital One credit card
11	5/20/2014	$390.34	Capital One credit card
12	5/21/2014	$250.00	Capital One credit card
13	5/21/2014	$175.00	Capital One credit card
14	5/28/2014	$396.38	Capital One credit card
15	5/30/2014	$180.93	Capital One credit card

All in violation of Title 18, United States Code, Section 1344(2).

A TRUE BILL.

Original document – Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.